



CONFIRMATION OF SUBMITTAL ATTACHED

18 February 2009

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission,
445 12th Street, SW, Suite TW-A325
Washington, DC 20554.

Received & Inspected

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FCC Mail Room

2008 Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: 18 February 2009

Name of company covered by this certification: Aspire Telecom, Inc.

Form 499 Filer ID: 826773

Name of signatory: R. Adam Kane

Title of signatory: President

I, R. Adam Kane, certify that I am an officer of the company named above, and acting as its agent, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules .

The Company has not taken any actions (neither legal proceedings nor petitions at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The Company has neither information nor experience to disclose with respect to pretexters nor to the processes they may use to attempt to access customers' individually identifiable CPNI. The steps we take to protect CPNI are detailed on the attached "Supporting Statement of Aspire Telecom, Inc."

The Company has not received any customer complaints in the past year concerning the unauthorized release of individually identifiable CPNI.

The Company is only now filing this 2007 certification simply because, prior to three days ago, we were not aware of the existence of this certification or the mandate to file one.

Sincerely yours,

R. Adam Kane, President & C.E.O.

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Supporting Statement of Aspire Telecom, Inc (Aspire)

Aspire Telecom, Inc. has adequate safeguards in place and is actively protecting the personal information of its customers as testified to by the below statements.

In regards to consumers' call records: Aspire keeps customer call record data under lock and key in its corporate offices except when these records are actively being handled by employees for normal and usual business purposes. Aspire holds these records in both electronic and physical forms. Protections for the electronic files are discussed below. Physical forms are retained only so long as needed for investigative purposes, typically no more than 6 months. Discarded forms are delivered to a recycling and document destruction company. Aspire receives and maintains certificates of destruction from the recycler for those physical documents.

The confidentiality of electronic forms of individually identifiable customer proprietary network information (CPNI) including, among other things: customers' calling activities, history, and billing records, is protected from unauthorized external access by a monitored and "Managed" data firewall and from unauthorized internal access by username and password protection on all data terminals. By employing an actively monitored firewall system, Aspire both dissuades and would quickly recognize instances of intentional external attack and/or internal employee misconduct.

Aspire does not use customer phone records for its own marketing purposes, except within the established boundaries of 47 C.F.R. § 64.2005, without appropriate consumer approval. Aspire does mail customers special notices from time to time, usually by including the same in their regular monthly reminder notices. Such special notices include, but are not limited to: mandated regulatory announcements, price and/or product changes, and the like as is normal and usual business practice. Aspire does not sell, otherwise divulge or distribute customer lists or customer data compendia to anyone. Aspire does not use, disclose, nor permit access to customer data without approval of the customer, except in connection with its own and/or its authorized agents' activities which are required to properly and professionally provide subscribed service to its customers. Aspire does, on occasion, use a trusted "mailing house" to take possession of, fold, stuff, post and mail monthly reminder (billing) notices to our customers.

To prevent breaches of confidentiality by those who may try impersonating the account holder, staff routinely 1) verifies that the Caller I.D. of the person calling matches that of the customer and/or 2) queries the caller for information which is unlikely to be available to an impersonator.

Aspire is such a small company that it is virtually impossible for anyone to successfully impersonate any company employee. Aspire's existing employee handbook has been abridged to include specific language addressing the sanctity, security and disciplinary processes pertinent to the breach of or disclosure of CPNI to an unauthorized party.

To the best of our knowledge no data broker has ever approached either the company or any of its employees in an attempt to acquire knowledge of our customer's proprietary network information nor is the company aware of any attack on our data bases or on our data security protocols.

To the best of our knowledge none of our customer's personally identifiable proprietary network information has ever been released without authorization to anyone except at the specific request of a particular customer for a clearly specified, one-time purpose.

As a result of being required to file this certification, our awareness of the need to protect CPNI has been elevated. Aspire continues to investigate ways to improve our safeguards including, but not limited to the following: (1) consumer-set passwords; (2) instructional, advisory notices to internal users who have access to customer records; (3) record and maintain customer approvals (e.g., Opt-in) and withdrawal of approval (Opt-out) for the authorized release of CPNI in the customer's history records; (4) implementation of notice procedures to inform customers in the unlikely event of the release of CPNI data.

By all of the above means, Aspire has implemented and is maintaining safeguards that guard against unauthorized access to and thus prevents the sale of consumers' private personal and confidential data.

This Supporting Statement of Aspire Telecom, Inc is
Respectfully submitted by,

A handwritten signature in black ink, appearing to read "R. Adam Kane". The signature is stylized with a large, sweeping initial "R" and a long, horizontal stroke extending to the right.

R. Adam Kane, President

**Federal Communications Commission**

The FCC Acknowledges Receipt of Comments From ...
Aspire Telecom, Inc.
...and Thank You for Your Comments

Your Confirmation Number is: '2009218055864 '

Date Received: Feb 18 2009

Docket: 96-115

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